

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.

JUL 12 2021

UNITED STATES OF AMERICA)

v.)

MICHAEL HARVEL)

No.)

2:21-00005

18 U.S.C. § 242

18 U.S.C. § 1201(a)

DT
DEPUTY CLERK

INDICTMENT

THE GRAND JURY CHARGES:

At all times material to this Indictment:

Introduction

1. **MICHAEL HARVEL** was an employee of Cumberland County, Tennessee, where he worked as the Director of the Cumberland County Solid Waste Department.

2. **MICHAEL HARVEL**'s office was located in the Cumberland County Recycling Center (hereinafter "Recycling Center") in Crossville, Tennessee.

3. As part of his official duties with Cumberland County, **MICHAEL HARVEL** supervised workers at the Recycling Center, its satellite locations, and several nearby county landfills.

4. During his tenure, **MICHAEL HARVEL** supervised dozens of women who served their community service time at the Recycling Center and/or worked there as paid employees.

5. From approximately 2015 – 2018, the women **MICHAEL HARVEL** supervised at the Recycling Center included: Victim 1, Victim 2, Victim 3, Victim 4, Victim 5, Victim 6, and Victim 7.

Paragraphs 1-5 are hereby incorporated by reference into the counts set forth below.

COUNT ONE

In or around July 2017, in the Middle District of Tennessee, **MICHAEL HARVEL**, while acting under color of law, willfully deprived Victim 1, a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from the deprivation of liberty without due process of law, which includes the right to bodily integrity. Specifically, **MICHAEL HARVEL** confined Victim 1 in a locked room at a county facility and, against her will, physically pushed her onto a table, fondled her breasts, and forced her to touch his genitals. The offense resulted in bodily injury to Victim 1 and included kidnapping.

All in violation of Title 18, United States Code, Section 242.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

In or around November 2015, in the Middle District of Tennessee, **MICHAEL HARVEL**, while acting under color of law, willfully deprived Victim 2, a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from the deprivation of liberty without due process of law, which includes the right to bodily integrity. Specifically, **MICHAEL HARVEL** approached Victim 2 in a dark office and, against her will, physically pushed her onto a desk and penetrated her vagina with his penis. The offense included aggravated sexual abuse.

All in violation of Title 18, United States Code, Section 242.

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

In or around December 2015, in the Middle District of Tennessee, **MICHAEL HARVEL**, while acting under color of law, willfully deprived Victim 2, a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from the deprivation of liberty without due process of law, which includes the right to bodily integrity. Specifically, **MICHAEL HARVEL** picked up Victim 2 in his truck under the false pretense that he needed help with an official county work project, drove her to an isolated landfill, and, against her will, penetrated her vagina with his penis. The offense included kidnapping.

All in violation of Title 18, United States Code, Section 242.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

In or around December 2015, in the Middle District of Tennessee, **MICHAEL HARVEL**, seized, confined, inveigled, kidnapped, abducted, and carried away and held Victim 2, a person known to the Grand Jury, for a reward and otherwise, and used an instrumentality of interstate commerce in committing and in furtherance of the offense. Specifically, **MICHAEL HARVEL** picked up Victim 2 in his truck under false pretenses and drove her to an isolated landfill for the purpose of sexually assaulting her.

All in violation of Title 18, United States Code, Section 1201.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

In or around July 2017, in the Middle District of Tennessee, **MICHAEL HARVEL**, while acting under color of law, willfully deprived Victim 3, a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from the deprivation of liberty without due process of law, which includes the right to bodily integrity. Specifically, **MICHAEL HARVEL** approached Victim 3 at the Recycling Center and, against her will, forced his hands under her clothing and fondled her breasts and put his hands down her pants.

All in violation of Title 18, United States Code, Section 242.

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

In or around December 2017, in the Middle District of Tennessee, **MICHAEL HARVEL**, while acting under color of law, willfully deprived Victim 4, a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from the deprivation of liberty without due process of law, which includes the right to bodily integrity. Specifically, **MICHAEL HARVEL** approached Victim 4 at the Recycling Center and, against her will, fondled her breasts under her clothing, forced his hands down her pants, and fondled her buttocks and the outside of her vagina.

All in violation of Title 18, United States Code, Section 242.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

In or around March 2017, in the Middle District of Tennessee, **MICHAEL HARVEL**, while acting under color of law, willfully deprived Victim 5, a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from the deprivation of liberty without due process of law, which includes the right to bodily integrity. Specifically, **MICHAEL HARVEL** approached Victim 5 at the Recycling Center and, against her will, fondled her breasts over her clothing and pulled down her pants, exposing her naked buttocks and vagina.

All in violation of Title 18, United States Code, Section 242.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES:

In or around December 2017, in the Middle District of Tennessee, **MICHAEL HARVEL**, while acting under color of law, willfully deprived Victim 6, a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from the deprivation of liberty without due process of law, which includes the right to bodily integrity. Specifically, **MICHAEL HARVEL** approached Victim 6 at the Recycling Center and, against her will, forced his hands between her legs and rubbed her vagina over her clothes.

All in violation of Title 18, United States Code, Section 242.

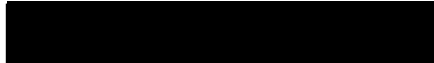
COUNT NINE

THE GRAND JURY FURTHER CHARGES:

In or around December 2017, in the Middle District of Tennessee, **MICHAEL HARVEL**, while acting under color of law, willfully deprived Victim 7, a person known to the Grand Jury, of the right, secured and protected by the Constitution and laws of the United States, to be free from the deprivation of liberty without due process of law, which includes the right to bodily integrity. Specifically, **MICHAEL HARVEL** called Victim 7 to his office at the Recycling Center and, against her will, forced his hands down her pants and groped her buttocks.

All in violation of Title 18, United States Code, Section 242.

A TRUE BILL



~~GRAND JURY~~ FOR ~~THE~~ PERSON

MARY JANE STEWART
ACTING UNITED STATES ATTORNEY



SARA BETH MYERS
ASSISTANT UNITED STATES ATTORNEY



MICHAEL J. SONGER
TRIAL ATTORNEY
CIVIL RIGHTS DIVISION